

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
(GREENWOOD DIVISION)

Private Solutions, Inc.,
Plaintiff,

v.
SCMC, LLC d/b/a Seneca SCMC, LLC,
Defendant.

)
) Case No. 14-cv-03874-GRA
)

) **Motion**
) **in Support of**
) ***Pro Hac Vice* Application**
)

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Thomas J. Gaffney, Esq. be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).
 - ☒ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐ will likely oppose; ☒ does not intend to oppose
 - ☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):

☐ No duty of consultation is required because the opposing party is proceeding pro se.

William W. Watkins, P.A.

Firm Name

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Name of Local Counsel

W. W. Watkins, Sr.

Signature of Local Counsel

Local Counsel for the Defendant

District of South Carolina

revised 09/19/05